APPENDIX B

TEXAS WATER COMMISSION NOTICE OF REGISTRATION

5-16-91

THIS IS NOT A PERMIT AND DOES NOT CONSTITUTE AUTHORIZATION OF ANY WASTE MANAGEMENT ACTIVITIES_OR FACILITIES LISTED BELOW. REQUIREMENTS FOR SOLID WASTE MANAGEMENT ARE PROVIDED BY TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TEXAS WATER COMMISSION (TWC). CHANGES OR ADDITIONS TO WASTE MANAGEMENT METHODS REFERRED TO IN THIS NOTICE REQUIRE WRIT-TEN NOTIFICATION TO THE TWC.

DATE OF NOTICE: 04-26-91

REGISTRATION DATE: 01-29-79

REGISTRATION NUMBER: 31424 EPA I.D. NUMBER: TXD000807909

THE REGISTRATION NUMBER PROVIDES ACCESS TO STORED INFOR-MATION PERTAINING TO YOUR OPERATION. PLEASE REFER TO THAT NUMBER IN ANY CORRESPONDENCE.

COMPANY NAME: MOBIL CHEMICAL COMPANY

MAILING ADDRESS: PE PLANT

P 0 BOX 2295

BEAUMONT, TEXAS 77704

GENERATING SITE LOCATION:

NORTH OF U.S. HWY 90, 7 MILES WEST OF BEAUMONT

CONTACT PERSON: DONNA M. SMITH

PHONE: (409) 860-2168

NUMBER OF EMPLOYEES: GREATER THAN 100

TWC DISTRICT: 06

REGISTRATION STATUS: ACTIVE REGISTRATION TYPE: GENERATOR HAZARDOUS WASTE STATUS: GENERATOR

WASTE GENERATED:

WASTE

NUMBER DESCRIPTION

CLASS CODE DISPOSITION

001 PLANT REFUSE, GENERAL MISC. II 279760 ON-SITE/OFF-SITE

002 TRICHLOROETHANE OR TETRACHLORO IH 910200 ON-SITE/OFF-SITE ETHANE

> EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): FOO1, DOO1

003 ACID, SULFURIC, MERCURY CONTAI IH 901990 ON-SITE/OFF-SITE NING

2

NOTICE OF REGISTRATIC CONTINUED)
REGISTRATION NUMBER: 51424
COMPANY NAME: MOBIL CHEMICAL COMPANY

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO9, DOO2, DO11, DOO6, DOO7, DO10

004 OIL, WASTE II 210450 ON-SITE/OFF-SITE/ SE CONDARY USE

005 WAX II 280610 ON-SITE/OFF-SITE

006 LAB WASTE, ORGANIC LIQUID IH 910590 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO2, DOO3, FOO3, FOO5

007 WATER TREATMENT SLUDGE II 240150 ON-SITE/OFF-SITE

008 DESSICANT III 370960 ON-SITE/OFF-SITE

009 WASTEWATER, INDUSTRIAL PROCESS I 100710 NO L'ONGER GENERATED (DOMESTIC-INDUSTRIAL GRADE)

010 WAX IH 980610 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, FOO3

Oll WATER TREATMENT CHEMICALS II 213140 ON-SITE/OFF-SITE

012 METHANOL IH 911080 NO LONGER GENERATED

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO!

O13 PROPENE ALDEHYDE (21% H20 SOL IH 912000 NO LONGER GENERATED UBLE)

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO3

014 GASOLINE, CONTAMINATED IH 912600 NO LONGER GENERATED

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO!

015 SOLVENTS, HALOGENATED IH 911150 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): FOO1, FOO2, FOO3, FOO5

016 SOLVENTS, NON-HALOGENATED IH 913860 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): FOO3, DOO1

017 CATALYST, SILICA GEL, CONTAINI IH 972240 ON-SITE/OFF-SITE NG CHROMIUM

DESIGNATION WHOSE THE

REGISTRATION NUMBER: 31424

COMPANY NAME: MOBIL CHEMICAL COMPANY

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO7 018 SOLVENTS CONTAINING ALUMINUM A IH 917270 ON-SITE/OFF-SITE LKYLS- PYROPHORIC EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO3 019 ACETONITRILE (METHYL CYANIDE) IH 912830 ON-SITE/OFF-SITE EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO3 020 PLANT WASTES, CONTAMINATED I 175500 ON-SITE/OFF-SITE 021 CORROSIVE WASTES I H 902880 ON-SITE/OFF-SITE/SOL D FOR RECOVERY EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO2 022 OIL, WASTE 910450 ON-SITE/OFF-SITE/SOL D FOR RECOVERY EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1 023 ETHYLENE GLYCOL 110250 ON-SITE/OFF-SITE 024 DESSICANT IH 970960 ON-SITE/OFF-SITE EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO2 025 MONOMER, WASTE IH 911450 NO LONGER GENERATED EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1 026 CLEANING SOLUTION, ACID AND/OR IH 901110 ON-SITE/OFF-SITE CAUSTIC EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO2 027 PROCESSING CHÉMICAL ADDITIVES, I 103160 ON-SITE/OFF-SITE MISC 028 TETRAHYDROFURAN 910950 NO LONGER GENERATED IH

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR

1H

915310 NO LONGER GENERATED

DESCRIPTIONS): DOO1

029 ETHYL ALCOHOL

FAUL

REGISTRATION NUMBER: 1424
COMPANY NAME: MOBIL CHEMICAL COMPANY

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1

030 PROCESSING CHEMICAL ADDITIVES, IH 903160 ON-SITE/OFF-SITE MISC

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO3, DOO2

O31 OIL AND SOLVENT, IN WATER IH 908560 ON-SITE/OFF-SITE/SOL D FOR RECOVERY

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): FOO1, DOO1

032 LAB WASTE, LIQUID IH 907050 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, FOO3

O33 METAL SCRAP

II 270350 ON-SITE/OFF-SITE/SOL
D FOR RECOVERY

O34 NAPHTHA IH 910020 ON-SITE/OFF-SITE/SOL D FOR RECOVERY

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1

035 FUEL IH 917070 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO3, FOO3

036 ASBESTOS, GASKET CUTTINGS AND I 173090 ON-SITE/OFF-SITE INSULATION CONTAINING

037 BATTERIES, LITHIUM IH 976810 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO2, DOO3

038 PAINT AND SOLVENTS IH 916940 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO7, DOO8, FOO3, FOO5

039 CATALYST AND SOLVENT IH 919080 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): DOO1, DOO2, DOO7, FOO3, FOO5

040 RAGS, CONTAMINATED IH 983480 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): FOO1

5

COMPANY NAME: MOBIL CHEMICAL COMPANY

041	PCB CAPACITOR	1	173880	ON-SITE/OFF-SITE
042	PCB TRANSFORMER OIL	1	116080	ON-SITE/OFF-SITE
043	CONSTRUCTION DEBRIS AND NON-CO MBUSTIBLE WASTE	11	270510	ON-SITE/OFF-SITE
044	SOIL, HYDROCARBON CONTAMINATED	11	279360	ON-SITE/OFF-SITE
045	CONTAINERS, EMPTY AND RENDERED UNUSABLE	11	270508	OFF-SITE

II. Shipping/Reporting: Pursuant to Section 335 of the Texas Administrative Code of the rules of the TWC pertaining to Hazardous Waste management, issuance of manifests and annual reporting are required for Off-site Storage/Processing/Disposal of the following wastes listed in Part I. All manifested wastes should be reported on the annual waste summary report and submitted to the TWC by the 25th of each January for the prior calendar year.

In addition for any of the following waste(s) manifested and shipped to Storage/Processing/Disposal facilities in any other state a waste shipment summary is required. All such shipments should be reported on the waste shipment summary report and submitted to the TWC no later than the 25th day of the month immediately succeeding the month in which the shipment was made. No waste shipment summary report is required for months when out of state shipments are not made.

002 910200 TRICHLOROETHANE OR TETRACHLORO ETHANE 003 901990 ACID, SULFURIC, MERCURY CONTAI · NING 006 910590 LAB WASTE, ORGANIC LIQUID 010 980610 WAX 015 911150 SOLVENTS, HALOGENATED 913860 SOLVENTS, NON-HALOGENATED 017 972240 CATALYST, SILICA GEL, CONTAINI NG CHROMIUM 018 917270 SOLVENTS CONTAINING ALUMINUM A LKYLS- PYROPHORIC 019 912830 ACETONITRILE (METHYL CYANIDE) 020 175500 PLANT WASTES, CONTAMINATED

902880 CORROSIVE WASTES

021

		022	910450	OIL, WASTE
		023	110250	ETHYLENE GLYCOL
		024	970960	DESSICANT
		026	901110	CLEANING SOLUTION, ACID AND/OR CAUSTIC
		027	103160	PROCESSING CHEMICAL ADDITIVES, MISC
		030	903160	PROCESSING CHEMICAL ADDITIVES, MISC
1	ŧ	031	908560	OIL AND SOLVENT, IN WATER
		032	907050	LAB WASTE, LIQUID
		034	910020	NAPHTHA
		035	917070	FUEL
		036	173090	ASBESTOS, GASKET CUTTINGS AND INSULATION CONTAINING
		037	976810	BATTERIES, LITHIUM
		038	916940	PAINT AND SOLVENTS
		039	919080	CATALYST AND SOLVENT
		040	983480	RAGS, CONTAMINATED
		041	173880	PCB CAPACITOR
		042	116080	PCB TRANSFORMER OIL

III. ON-SITE WASTE MANAGEMENT FACILITIES:

FACILITY

FAC NO.

AC	NO.	FACILITY	STATUS
0		SURFACE IMPOUNDMENT STORAGE	ACTIVE
		OF WASTE NUMBER(S) 007 2 POND SYSTEM	
0.		TANK STORAGE FOR LESS THAN 90 DAYS OF WASTE NUMBER(S) 010, 035	ACTIVE
		TANK: F-710, TOTALLY EXEMPTED TREATMENTFACILITY EXEMPTED FROM PERMITTING	

REGISTRATION NUMBER: 3:424

COMPANY NAME: MOBIL CHEMICAL COMPANY

O3 CONTAINER STORAGE AREA STORAGE FOR LESS THAN 90 DAYS

OF WASTE NUMBER(S) 002, 003, 005, 006, 010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 021, 022, 023, 024, 026, 027, 028, 029, 030, 032, 036, 037, 038, 039, 040, 041, 042

O4 MISCELLANEOUS STORAGE CONTAINERS STORAGE FOR LESS THAN 90 DAYS OF WASTE NUMBER (S) 020 SEALED ROLL-OFF BOX

ACTIVE

ACTIVE

.

- O5 TANK (SURFACE)
 STORAGE FOR LESS THAN 90 DAYS
 OF WASTE NUMBER (S) 022, 035
 TANK: F-706, TOTALLY ENCLOSED TREATMENTFACILITY
 EXEMPTED FROM PERMITTING.
- OF TANK (SURFACE)

 STORAGE FOR LESS THAN 90 DAYS

 OF WASTE NUMBER (S) 022, 035

 TANK: F-707, TOTALLY ENCLOSED TREATMENTFACILITY

 EXEMPTED FROM PERMITTING
- O7 TANK (SURFACE)

 STORAGE FOR LESS THAN 90 DAYS

 OF WASTE NUMBER(S) 010, 016, 025, 035

 TANK: F-713, TOTALLY ENCLOSED TREATMENTFACILITY

 EXEMPTED FROM PERMITTING
- O8 TANK (SURFACE)
 STORAGE FOR LESS THAN 90 DAYS
 OF WASTE NUMBER (S) 010, 012, 013, 014, 016, 025,
 035
 TANK: F-714, TOTALLY EXEMPTED TREATMENTFACILITY
 EXEMPTED FROM PERMITTING
- O9 LANDFILL ACTIVE DISPOSAL OF WASTE NUMBER (S) 007, 043, 044 LOCATED AT THE MOBIL 0&A FAC.-REG.-30047, FAC. 01 USED BY THIS MOBIL FAC. P.E. PLANT
- OF WASTE NUMBER (S) 001, 008, 033, 034

 OPEN ROLL-OFF BOX

UNLESS OTHERWISE STATED ABOVE, FACILITIES ARE LOCATED AT NORTH OF U.S. HWY 90, 7 MILES WEST OF BEAUMONT COUNTY OF JEFFERSON

REGISTRATION NUMBER: 51424
COMPANY NAME: MOBIL CHEMICAL COMPANY

IV. RECORDS.

A. FOR PURPOSES OF FILING ANNUAL REPORTS PURSUANT TO TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TWO PERTAINING TO INDUSTRIAL SOLID WASTE MANAGEMENT, RECORDS SHOULD BE MAINTAINED FOR STORAGE, PROCESSING AND/OR DISPOSAL OF THE FOLLOWING WASTE (S) LISTED IN PART 1:

002 910200 TRICHLOROETHANE OR TETRACHLORO ETHANE

003 901990 ACID, SULFURIC, MERCURY CONTAI

006 910590 LAB WASTE, ORGANIC LIQUID

010 980610 WAX

015 911150 SOLVENTS, HALOGENATED

016 913860 SOLVENTS, NON-HALOGENATED

017 972240 CATALYST, SILICA GEL, CONTAINI
NG CHROMIUM

018 917270 SOLVENTS CONTAINING ALUMINUM A
LKYLS- PYROPHORIC

019 912830 ACETONITRILE (METHYL CYANIDE)

020 175500 PLANT WASTES, CONTAMINATED

021 902880 CORROSIVE WASTES

022 910450 OIL, WASTE

023 110250 ETHYLENE GLYCOL

024 970960 DESSICANT

026 901110 CLEANING SOLUTION, ACID AND/OR CAUSTIC

027 103160 PROCESSING CHEMICAL ADDITIVES, MISC

030 903160 PROCESSING CHEMICAL ADDITIVES, MISC

031 908560 OIL AND SOLVENT, IN WATER

032 907050 LAB WASTE, LIQUID

034 910020 NAPHTHA

035 917070 FUEL

REGISTRATION NUMBER: 3.-24
COMPANY NAME: MOBIL CHEMICAL COMPANY

036 173090 ASBESTOS, GASKET CUTTINGS AND INSULATION CONTAINING

037 976810 BATTERIES, LITHIUM

038 916940 PAINT AND SOLVENTS

039 919080 CATALYST AND SOLVENT

040 983480 RAGS, CONTAMINATED

041 173880 PCB CAPACITOR

042 116080 PCB TRANSFORMER OIL

APPENDIX C

CHEMICAL ANALYSIS DATA WASTEWATER SURGE BASIN SEDIMENT

(from ref. 25)

WASTEWATER IMPOUNDMENT SEDIMENT CHARACTERIZATION DATA

PARAHETER		MCC-1	MCC-4	HCC-9	Sample MCC-10	Sample ID Number -10 MCC-12	MCC-21	MCC-24	NCC-32	NCC-35
IGNITABILITY	ĹL.	212.	212**	212**	212**	212**	212**	212.	21200	2120
CORROSIVITY	s.u.	7.80	7.50	9.00	7.00	7.20	7.60			,
REACTIVITY		YES	YES	YES	YES	YES	YES	YES	YES	7FS
SULFIDE	MG/L	174.00	30.00	207.00	2.00•	2.00	92.00	150.00	88.00	00.6
CYANIDE	MG/L	2.00•	1.10	2, 10	3.00	3.00	5.10	10.00	8 8	
ARSENIC	MG/L	.010•	.010	.010.	.013	.010	.010	.010	.010	.010
BARIUM	MG/L	.440	. 490	. 660	. 500	.570	.390	. 660	.750	. 540
CADMIUM	MG/L	.001	• 100 •	. 001.	.001	. 003	.001	. 007	.001	00.
CHROMIUM	MG/L	.020	. 019	.013	.017	.022	. 023	.024	.018	.025
LEAD	NG/L	.010	.010	.010•	.010	.010	.010	.010•	.010	.010
MERCURY	MG/L	.002•	• 002•	.002	.002	.002	.002	.002	•005•	.002
SELENIUM	MG/L	.010•	.010•	.010•	.010	.010	.010	.010	.010	.010
SILVER	MG/L	.002	.002•	.002	.002	.002•	.002•	.002•	.002	.002
1 0C	MG/L	31027.3	23452.5	7113.1	35828, 1	14906.4	15877.1	20228.4	47410.0	16550.2
ТОХ	MG/L	41.25 165.	165.40	64.40	175.15	149.60	158.60	131.70	129.60	135.50

• = LESS THAN DETECTION LIMIT
•• = GREATER THAN DETECTION LIMIT

TABLE 2

WASTEWATER IMPOUNDMENT SEDIMENT CHARACTERIZATION DATA

STATISTCAL ANALYSIS OD DATA IN TABLE 1

PARAMETER	UNITS	NUMBER	HUNIXAH	HUHIHUH	HEAN	S.D.	RCRA THRESHOLD LIMIT
IGNITABILITY	F	9	212.00	212.00	212.00	.0000	< 140
CORROSIVITY	s.u.	9	9.000	7.000	7.578	. 5932	•
REACTIVITY	MG/L	9	N/A	N/A	N/A	N/A	-
SULFIDE	MG/L	9	207.00	2.00	83.00	79.64	1
CYANIDE	MG/L	9	10.000	1.100	4. 433	3.002	-
ARSENIC	MG/L	9	.01	.01	.0103	.0010	5.00
BARIUM	MG/L	9	.750	.390	. 556	.1163	100.00
CADNIUN	MG/L	9	.01	.001	.0022	.0021	1.00
CHRONIUM	MG/L	9	.03	.01	.0201	.0038	5.00
.EAD	MG/L	9	.01	.01	.0100	.0000	5.00
ERCURY	MG/L	9	.002	.002	.002	.0000	. 20
SELENIUM	MG/L	9	.01	.01	.010	.0000	1.00
SILVER	MG/L	9	.002	.002	.0020	.0000	5.00
roc	MG/L	9	47410.00	7113.10	23599.23	12448.58	:-
rox	MG/L	9	175. 15	41.25	127.91	45.6450	i n

^{• =} pH LESS THAN OR EQUAL TO 2.0 AND GREATER THAN OR EQUAL TO 12.5

TABLE 3

WASTEWATER IMPOUNDMENT SEDIMENT CHARACTERIZATION DATA

STATISTICAL ANALYSIS OF DATA IN TABLE 1

			S.D.		
ARSENIC					.01 ± 4.56E-4
BARIUM	9	. 556	.1163	.0388	.556 ± .0542
CADMIUM	9	.0022	.0021	.0007	.0022 ± 9.78E-4
CHRONIUM	9	.0201	.0038	.0013	.0201 ± .0018
LEAD	9	.01	0	0	.01 ± 0
MERCURY	9	.002	0	0	.002 ± 0
SELENIUM	9	.01	0	0	.01 ± 0
SILVER	9	.002	0	0	.002 ± 0
CORROSIVITY	9	7.578	. 5932	. 1977	7.578 ± .276
SULFIDE	9	83	79.64	26.547	83 ± 37.09
CYANIDE	9	4.433	3.002	1.0007	4.433 ± 1.40
тос	9	23599. 23	12448.58	4149.53	23599.23 ± 5796.89
тох	9	127.91	45.645	15.215	127.91 ± 21.25

REFERENCE: TEST METHODS FOR EVALUATING SOLID WASTE,
PHYSICAL / CHEMICAL METHODS, U.S.EPA, SW-846, JULY 1982

TABLE 4

WASTEWATER IMPOUNDMENT SEDIMENT CHARACTERIZATION DATA

PARAMETER UNITS MCC-1 MCC	UNITS	UNITS MCC-1 MCC	NCC-4	MCC-9	MCC-10	MCC-12	MCC-21	MCC-24	MCC-32	MCC-35
LINDANE	MG/L	• 2000		.0002•	. 0002*	.0002*	.0002•	.0002•	.0002•	.0002
ENDRIN	MG/L	.0002	.0002	.0002	.0002	.0002	.0002	.0002	.0002	.0002
METHOXYCHLOR	MG/L	.002	.002•	.002	.002	.002	.002	.002•	.002	.002•
TOXAPHENE	MG/L	.005	.005	.005	.005	.005	• 500 •	.005	.005	. 005
2,4-D	MG/L	.010•	.010•	.010	.010	.010	.010.	.010.	.010	.010
2, 4, 5-TP(SILVEX) MG/L .00400	MG/L	.004	• 1004	.004	.004	.004	. 004	.004	.004	.004

• * LESS THAN DETECTION LIMIT

TABLE 5

WASTEWATER IMPOUNDMENT SEDIMENT CHARACTERIZATION DATA

STATISTICAL ANALYSIS OF DATA IN TABLE 4

PARAMETER	UNITS	NUMBER	HUHIKAH	HUHIHIH	MEAN	S.D.	RCRA THRESHOLD LIMIT
LINDANE	MG/L	9	.0002	.0002	.0002	.000	. 40
ENDRIN	MG/L	9	.0002	.0002	.0002	.000	.02
METHOXYCHLOR	MG/L	9	.002	.002	.002	.000	10.00
TOXAPHENE	MG/L	9	.005	.005	.005	.000	. 50
2,4-D	MG/L	9	.010	.010	.010	.000	10.00
2,4,5-TP (SILVEX)	MG/L	9	.004	.004	.004	.000	10.00

APPENDIX D

SEDIMENT TCLP ANALYSES

SLUDGE DEWATERING BASIN (SWMU No. 1) WASTEWATER SURGE BASIN (SWMU No. 10) WASTEWATER AERATION BASIN (SWMU No. 12) EFFLUENT HOLDING BASIN (SWMU No. 13)



CORE LABORATORIES

CORE LABORATORIES
ANALYTICAL REPORT

Job Number: 920080 Prepared For:

MOBIL CHEMICAL COMPANY
BETTY COTTEN
P.O. BOX 2295
BEAUMONT, TX 77704

Date: 01/16/92

fit h

1-16-92

Name: ROBERT MORRIS

Core Laboratories 3645 Arizona Street Sulphur, LA 70663

Title: Laboratory Manager



CORE LABORATORIES

920080 J > Number I_te Sampled Time Sampled

01/03/92 15:00 01/06/92

11:40

me Received MOBIL CHEMICAL COMPANY istomer Name

Customer Address Ostomer Location 1stomer Contact

Date Received

 P.O. BOX 2295 BEAUMONT, TX 77704 - BETTY COTTEN

ient I.D. Sample Description

 WATER TREATMENT SLUDGE - (007/SSB) South Sludge Basin

Report Summary Based on the analysis requested by customer, Sample was not found to exceed any EPA regulatory thresholds.

SAMPLE MATRIX	RESULT
% Solid	49.6
% Aqueous	50.4
% Organic	< 0.5

HAZARDOUS WASTE CHARACTERIZATION

HAZ	ARDOUS WASI	D OM. Euro		REGULATORY
CHARACTERISTICS	RESULT	UNITS	METHOD(2)	THRESHOLD
Crosivity	7.6	Std Units	9040	$\leq 2 \text{ or } \geq 12.50$
as pH Icnitability ; Flashpoint	>200	Deg. F	1010	≤ 140 Deg. F
Keactivity T. Available Sulfide C. Available Cyanide	115.5 <0.01	mg/kg mg/kg	Section 7.3.4 Section 7.3.4	≥ 500 mg/kg ≥ 250 mg/kg REGULATORY
TOXICITY CHARACTERISTICS(I)	RESULT	UNITS	METHOD(2)	THRESHOLD
ILP METALS Arsenic Barium Cadmium Thromium Lead Mercury Selenium Silver	<0.05 3.1 <0.005 0.01 <0.09 <0.002 <0.14 <0.05	mg/l mg/l mg/l mg/l mg/l mg/l mg/l	7061 6010 6010 6010 6010 7470 6010	≥ 5.0 mg/l ≥ 100 mg/l ≥ 1.0 mg/l ≥ 5.0 mg/l ≥ 5.0 mg/l ≥ 5.0 mg/l ≥ 1.0 mg/l ≥ 1.0 mg/l ≥ 5.0 mg/l
TCLP VOLATILES Benzene Carbon tetrachloride Chlorobenzene Chloroform 1,2-Dichloroethane 1,1-Dichloroethylene Methyl ethyl ketone Tetrachloroethylene Trichloroethylene Vinyl chloride	<0.05 <0.05 <0.05 <0.05 <0.05 <0.05 <1.00 <0.05 <0.05 <0.05	mg/l mg/l mg/l mg/l mg/l mg/l mg/l mg/l	8240 8240 8240 8240 8240 8240 8240 8240	≥ 0.5 mg/l ≥ 0.5 mg/l ≥ 100 mg/l ≥ 6.0 mg/l ≥ 0.5 mg/l ≥ 0.7 mg/l ≥ 200 mg/l ≥ 0.7 mg/l ≥ 0.7 mg/l ≥ 0.7 mg/l ≥ 0.7 mg/l ≥ 0.2 mg/l

) REFERENCE: Federal Register, Friday, July 1, 1990, Part 261, Appendix II, Method 1311) REFERENCE: EPA Test Methods for Evaluating Solid Waste: Nov 1990 SW-846 Third Edition

On Behalf of Core Laboratories,

Robert Morris

Laboratory Manager

3645 Arizona Street Sulphur, La. 70663 (318) 583-4926

PAGE:1

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CORE LABORATORIES

Job Number

- 920080

Date Sampled

- 01/03/92

Time Sampled

- 15:00

Date Received

- 01/06/92

Time Received

- 11:40

Customer Name

MOBIL CHEMICAL COMPANY

Customer Address

- P.O. BOX 2295

Customer Location

BEAUMONT, TX 77704

Customer Contact

- BETTY COTTEN

Client I.D.

WATER TREATMENT SLUDGE

Sample Description - (007/SSB)

HAZARDOUS WASTE CHARACTERIZATION

TOXICITY CHARACTERISTICS(I)	RESULT	UNITS	METHOD(2)	REGULATORY THRESHOLD
M,P-Cresol O-Cresol 1,4-Dichlorobenzene 2,4-Dinitrotoluene Hexachlorobenzene Hexachloro-1,3-butadiene Hexachloroethane Nitrobenzene Pentachlorophenol Pyridine 2,4,5-Trichlorophenol 2,4,6-Trichlorophenol	<0.03 <0.03 <0.03 <0.03 <0.03 <0.03 <0.03 <0.03 <0.03 <0.03 <0.05 <0.03 <0.03	mg/l mg/l mg/l mg/l mg/l mg/l mg/l mg/l	8270 8270 8270 8270 8270 8270 8270 8270	≥ 200 mg/l ≥ 200 mg/l ≥ 7.5 mg/l ≥ 0.13 mg/l ≥ 0.13 mg/l ≥ 0.5 mg/l ≥ 3.0 mg/l ≥ 100 mg/l ≥ 5.0 mg/l ≥ 400 mg/l ≥ 2.0 mg/l

1) REFERENCE: Federal Register, Friday, July 1, 1990, Part 261, Appendix II, Method 1311 (2) REFERENCE: EPA Test Methods for Evaluating Solid Waste: Nov 1990 SW-846 Third Edition

On Behalf of Core Laboratories,

Robert Morris

Laboratory Manager

3645 Arizona Street Sulphur, La. 70663 (318) 583-4926



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BEAUMONT

DALLAS

HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER : D92-1588-4

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Surge Basin Sludge (007/SBS)

PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992 ANALYSIS METHOD : EPA 8270

TEST REQUESTED	DETECTION LIMIT		RESULTS
o-Cresol	0.08 mg/L	<	0.08 mg/L
m-Cresol	0.08 mg/L	<	0.08 mg/L
p-Cresol	0.08 mg/L	<	0.08 mg/L
2,4-Dinitrotoluene	0.04 mg/L	<	0.04 mg/L
Hexachlorobenzene	0.04 mg/L	<	0.04 mg/L
Hexachlorobutadiene	0.04 mg/L	<	0.04 mg/L
Hexachloroethane	0.04 mg/L	<	0.04 mg/L
Nitrobenzene	0.04 mg/L	<	0.04 mg/L
Pentachlorophenol	0.20 mg/L	<	0.20 mg/L
Pyridine	0.04 mg/L	<	0.04 mg/L
2,4,5-Trichlorophenol	0.04 mg/L	<	0.04 mg/L
2,4,6-Trichlorophenol	0.04 mg/L	<	0.04 mg/L

SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Nitrobenzene-d5 (SS)	50.0 μg/L	85.2 %
2-Fluorobiphenyl (SS)	50.0 μg/L	85.2 %
Terphenyl-d14 (SS)	50.0 μg/L	85.0 X
Phenol-d5 (SS)	100 µg/L	48.9 %



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DALLAS

HOUSTON

REPORT NUMBER : D92-1588-4 ANALYSIS METHOD : EPA 8270 PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
2-Fluorophenol (SS)	100 µg/L	48.8 %
2,4,6-Tribromophenol (SS)	100 µg/L	74.9 X

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DALLAS

HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER: D92-1588-4 REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS: Surge Basin Sludge (007/SBS)
PROJECT: Polyethylene Plant
DATE SAMPLED: 12-FEB-1992
ANALYSIS METHOD: EPA 8240

TCLP VOLATILE ORGANICS					
TEST REQUESTED	DETECTION LIMIT		RESULTS		
Benzene	0.01 mg/L	<	0.01	mg/L	
Carbon tetrachloride	0.01 mg/L	<	0.01	mg/L	
Chlorobenzene	0.01 mg/L	<	0.01	mg/L	
Chloroform	0.01 mg/L	<	0.01	mg/L	
1,4-Dichlorobenzene	0.01 mg/L	<	0.01	mg/L	
1,2-Dichloroethane	0.01 mg/L	<	0.01	mg/L	
1,1-Dichloroethene	0.01 mg/L	<	0.01	mg/L	
Methyl ethyl ketone	0.05 mg/L		0.16	mg/L	
Tetrachloroethene	0.01 mg/L		0.01	mg/L	
Trichloroethene	0.01 mg/L	<	0.01	mg/L	
Vinyl chloride	0.02 mg/L	<	0.02	ng/L	

QUALITY CONTROL DATA		
SURROGATE COMPOUND SPIKE LEVEL		SPIKE RECOVERED
1,2-Dichloroethane-d4(SS)	50.0 μg/L	107 X
Toluene-d8(SS)	50.0 μg/L	110 X
Bromofluorobenzene(SS)	50.0 μg/L	100 X

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DATE RECEIVED : 17-FEB-1992

REPORT NUMBER : D92-1588-4

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS: Surge Basin Sludge (007/SBS)

PROJECT: Polyethylene Plant

DATE SAMPLED: 12-FEB-1992

ANALYSIS METHOD: EPA 9020

TOTAL ORGANIC HALOGENS	A-C 1143 A-C		
TEST REQUESTED	DETECTION LIMIT		RESULTS
Total Organic Halogen	10 mg/Kg	<	10 mg/Kg

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David R. Godwin

Chief Executive Officer



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HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER : D92-1588-4

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Surge Basin Sludge (007/SBS)
PROJECT : Polyethylene Plant
DATE SAMPLED : 12-FEB-1992

TCLP METALS			
TEST REQUESTED	DETECTION LIMIT		RESULTS
Silver	0.01 mg/L	<	0.01 mg/L
Arsenic	0.05 mg/L	<	0.05 mg/L
Barium	0.1 mg/L		1.4 mg/L
Cadmium	0.01 mg/L		0.02 mg/L
Chromium	0.05 mg/L	<	0.05 mg/L
Mercury	0.001 mg/L	<	0.001 mg/L
Lead	0.02 mg/L	<	0.02 mg/L
Selenium	0.05 mg/L	<	0.05 mg/L

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REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Surge Basin Sludge (007/SBS)

PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Cyanide, Reactive	0.10 mg/Kg	< 0.10 mg/Kg
Total Solids	0.01 X	32.9 %
Sulfide, Reactive	0.1 mg/Kg	104 mg/Kg

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DALLAS

HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER : D92-1588-2

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Aeration Base Sludge (007/ABS)

PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992

ANALYSIS METHOD : EPA 8240

TEST REQUESTED	DETECTION LIMIT		RESULTS
Benzene	0.01 mg/L	<	0.01 mg/
Carbon tetrachloride	0.01 mg/L	<	0.01 mg/
Chlorobenzene	0.01 mg/L	<	0.01 mg/
Chloroform	0.01 mg/L	<	0.01 mg/
1,4-Dichlorobenzene	0.01 mg/L	<	0.01 mg
1,2-Dichloroethane	0.01 mg/L	<	0.91 mg
1,1-Dichloroethene	0.01 mg/L	<	0.01 mg
Methyl ethyl ketone	0.05 mg/L	5	0.85 mg
Tetrachloroethene	0.01 mg/L	<	0.01 mg
Trichloroethene	0.01 mg/L	<	0.01 mg
Vinyl chloride	0.02 mg/L	<	0.02 mg

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
1,2-Dichloroethane-d4(SS)	50.0 μg/L	76.1 X
Toluene-d8(SS)	50.0 μg/L	103 X
Bromofluorobenzene(SS)	50.0 μg/L	96.9 %

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DATE RECEIVED : 17-FEB-1992

REPORT NUMBER : D92-1588-2

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY: Mobil Chemical Corporation ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Aeration Base Sludge (007/ABS)

PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992 ANALYSIS METHOD : EPA 9020

TOTAL ORGANIC HALOGENS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Organic Halogen	10 mg/Kg	< 10 mg/Kg

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REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Aeration Base Sludge (007/ABS)

PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992 ANALYSIS METHOD : EPA 8270

CLP EXTRACTABLE ORGANICS		\neg	
TEST REQUESTED	DETECTION LIMIT		RESULTS
o-Cresol	0.08 mg/L	<	0.08 mg/L
n-Cresol	0.08 mg/L	<	0.08 mg/L
p-Cresol	0.08 mg/L	<	0.08 mg/L
2,4-Dinitrotoluene	0.04 mg/L	<	0.04 mg/L
Hexach lorobenzene	0.04 mg/L	<	0.04 mg/L
Hexachlorobutadiene	0.04 mg/L	<	0.04 mg/L
Hexachloroethane	0.04 mg/L	<	0.04 mg/L
Nitrobenzene	0.04 mg/L	<	0.04 mg/L
Pentachlorophenol	0.20 mg/L	<	0.20 mg/L
Pyridine	0.04 mg/L	<	0.04 mg/L
2,4,5-Trichlorophenol	0.04 mg/L	<	0.04 mg/L
2,4,6-Trichlorophenol	0.04 mg/L	<	0.04 mg/L

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Nitrobenzene-d5 (SS)	50.0 µg/L	84.1 %
2-Fluorobiphenyl (SS)	50.0 μg/L	82.0 %
Terphenyl-d14 (SS)	50.0 μg/L	83.6 %
Phenol-d5 (SS)	100 µg/L	30.4 X



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HOUSTON

REPORT NUMBER : D92-1588-2 ANALYSIS METHOD : EPA 8270

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
2-Fluorophenol (SS)	100 µg/L	28.4 %
2-Ftderoptienot (337		60 Q Y
2,4,6-Tribromophenol (SS)	100 μg/L	60.9 %

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ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS: Aeration Base Sludge (007/ABS)
PROJECT: Polyethylene Plant
DATE SAMPLED: 12-FEB-1992

TCLP METALS			
TEST REQUESTED	DETECTION LIMIT		RESULTS
Silver	0.01 mg/L	<	0.01 mg/L
Arsenic	0.05 mg/L	<	0.05 mg/L
Barium	0.1 mg/L		1.2 mg/L
Cadmium	0.01 mg/L		0.02 mg/L
Chromium	0.05 mg/L	<	0.05 mg/L
Mercury	0.001 mg/L	<	0.001 mg/L
Lead	0.02 mg/L	<	0.02 mg/L
Selenium	0.05 mg/L	<	0.05 mg/L

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David R. Godwin,

Chief Executive Officer



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HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER: D92-1588-2

REPORT DATE: 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Aeration Base Sludge (007/ABS) PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Cyanide, Reactive	0.10 mg/Kg	< 0.10 mg/Kg
Total Solids	0.01 %	47.9 %
Sulfide, Reactive	0.1 mg/Kg	112 mg/Kg

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BEAUMONT

DALLAS

HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER : D92-1588-3

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Holding Basin Sludge (007/HBS)

PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992 ANALYSIS METHOD : EPA 8270

EST REQUESTED	DETECTION LIMIT		RESULTS
o-Cresol	0.08 mg/L	<	0.08 mg/l
n-Cresol	0.08 mg/L	<	0.08 mg/l
o-Cresol	0.08 mg/L	<	0.08 mg/l
2,4-Dinitrotoluene	0.04 mg/L	<	0.04 mg/
Hexachlorobenzene	0.04 mg/L	<	0.04 mg/
Hexachlorobutadiene	0.04 mg/L	<	0.04 mg/
Hexachloroethane	0.04 mg/L	<	0.04 mg/
Nitrobenzene	0.04 mg/L	<	0.04 mg/
Pentachlorophenol	0.20 mg/L	<	0.20 mg/
Pyridine	0.04 mg/L	<	0.04 mg/
2,4,5-Trichlorophenol	0.04 mg/L	<	0.04 mg/
2,4,6-Trichlorophenol	0.04 mg/L	<	0.04 mg/

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
Nitrobenzene-d5 (SS)	50.0 μg/L	82.6 %
2-Fluorobiphenyl (SS)	50.0 μg/L	88.6 %
Terphenyl-d14 (SS)	50.0 μg/L	102 %
Phenol-d5 (SS)	100 μg/L	60.6 %



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DALLAS

HOUSTON

REPORT NUMBER : D92-1588-3 ANALYSIS METHOD : EPA 8270

PAGE 2

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
2-Fluorophenol (SS)	100 µg/L	61.5 X
2,4,6-Tribromophenol (SS)	100 µg/L	72.8 %

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SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Holding Basin Sludge (007/HBS)

PROJECT : Polyethylene Plant

DATE SAMPLED : 12-FEB-1992 ANALYSIS METHOD : EPA 8240

TEST REQUESTED	DETECTION LIMIT		RESULTS
Benzene	0.01 mg/L	<	0.01 mg/L
Carbon tetrachloride	0.01 mg/L	<	0.01 mg/L
Chlorobenzene	0.01 mg/L	<	0.01 mg/L
Chloroform	0.01 mg/L	<	0.01 mg/L
1,4-Dichlorobenzene	0.01 mg/L	<	0.01 mg/L
1,2-Dichloroethane	0.01 mg/L	<	0.01 mg/L
1,1-Dichloroethene	0.01 mg/L	<	0.01 mg/L
Methyl ethyl ketone	0.05 mg/L		0.90 mg/L
Tetrachloroethen e	0.01 mg/L	<	0.01 mg/L
Trichloroethene	0.01 mg/L	<	0.01 mg/L
Vinyl chloride	0.02 mg/L	<	0.02 mg/L

QUALITY CONTROL DATA			
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED	
1,2-Dichloroethane-d4(SS)	50.0 μg/L	104 %	
Toluene-d8(SS)	50.0 μg/L	107 %	
Bromofluorobenzene(SS)	50.0 μg/L	100 %	

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BEAUMONT

DALLAS

HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER : D92-1588-3

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Holding Basin Sludge (007/HBS)

PROJECT : Polyethylene Plant DATE SAMPLED : 12-FEB-1992 ANALYSIS METHOD : EPA 9020

TOTAL ORGANIC HALOGENS	0.000	
TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Organic Halogen	10 mg/Kg	< 10 mg/Kg

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DALLAS

HOUSTON -

DATE RECEIVED: 17-FEB-1992

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REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY : Mobil Chemical Corporation

ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

SAMPLE MATRIX : Sludge

ID MARKS : Holding Basin Sludge (007/HBS)

PROJECT : Polyethylene Plant

DATE SAMPLED: 12-FEB-1992

TCLP METALS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Silver	0.01 mg/L	< 0.01 mg/L
Arsenic	0.05 mg/L	< 0.05 mg/L
Barium	0.1 mg/L	1.1 mg/L
Cadmium	0.01 mg/L	< 0.01 mg/L
Chromium	0.05 mg/L	< 0.05 mg/L
Mercury	0.001 mg/L	< 0.001 mg/L
Lead	0.02 mg/L	0.03 mg/L
Selenium	0.05 mg/L	< 0.05 mg/L

NDRC Laboratories, Inc.

David R. Godwin,

Chief Executive Officer



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DALLAS

HOUSTON

DATE RECEIVED : 17-FEB-1992

REPORT NUMBER: D92-1588-3

REPORT DATE : 9-MAR-1992

SAMPLE SUBMITTED BY: Mobil Chemical Corporation ADDRESS: P.O. Box 2295

: Beaumont, Texas 77705

ATTENTION : Mrs. Betty Cotton

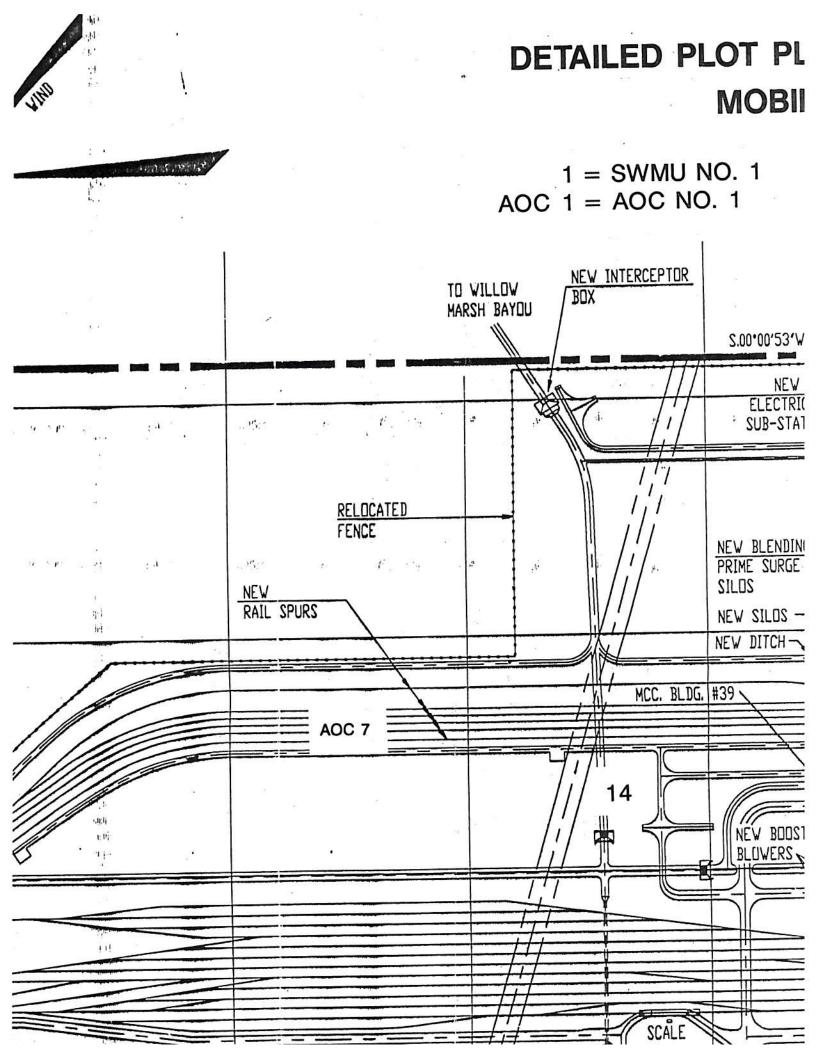
SAMPLE MATRIX : Sludge

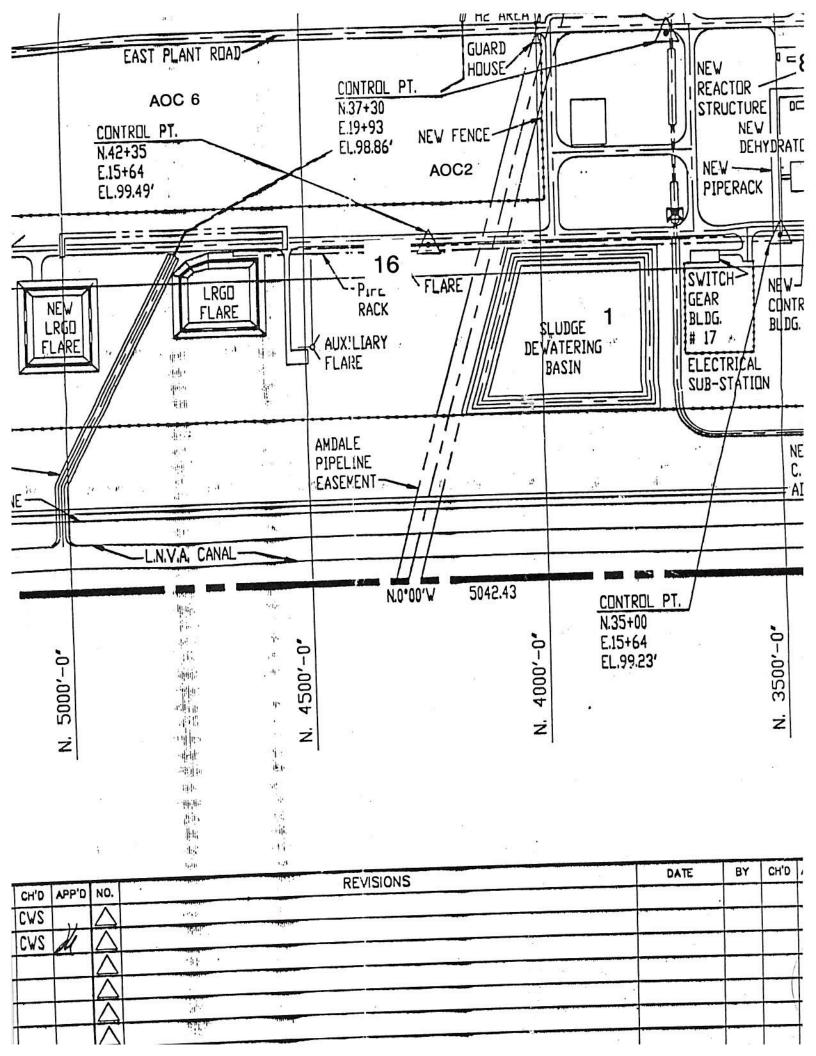
ID MARKS : Holding Basin Sludge (007/HBS)
PROJECT : Polyethylene Plant
DATE SAMPLED : 12-FEB-1992

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Cyanide, Reactive	0.10 mg/Kg	< 0.10 mg/Kg
Total Solids	0.01 X	54.9 %
Sulfide, Reactive	0.1 mg/Kg	96.0 mg/Kg

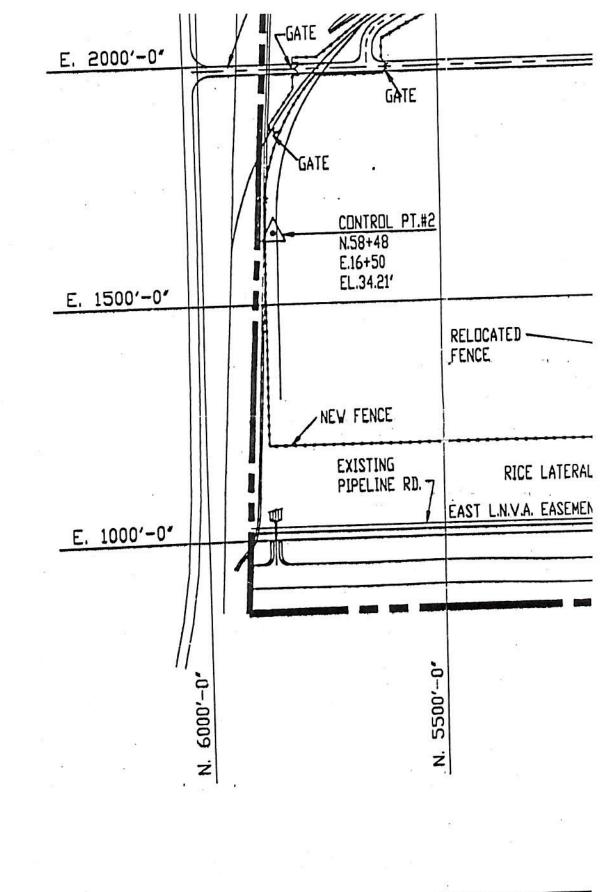
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David R. Godwin, Ph.D. Chief Executive Officer



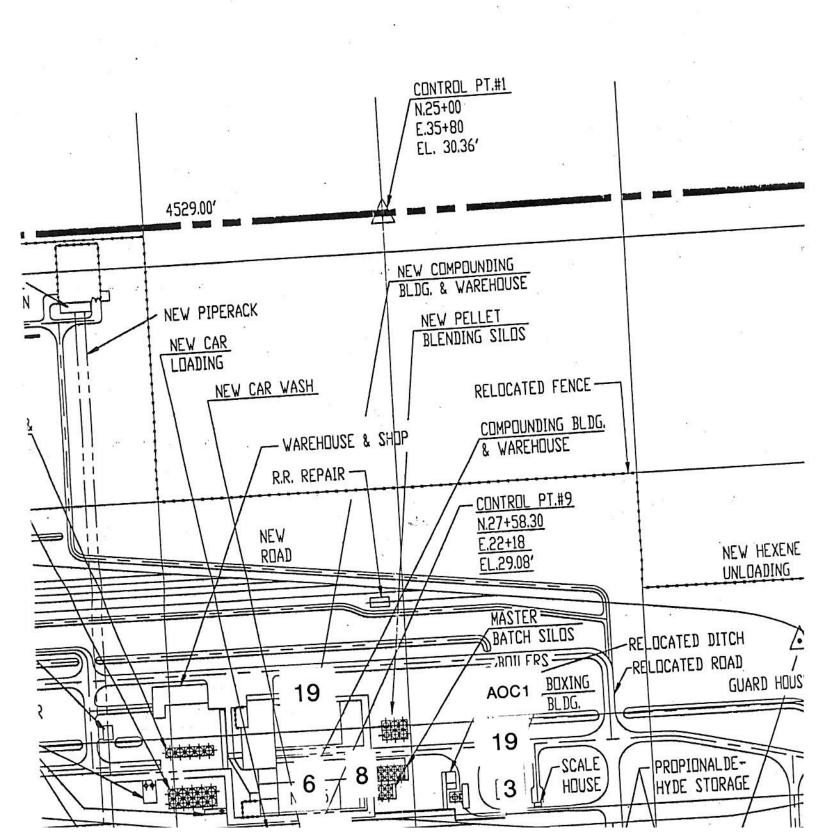


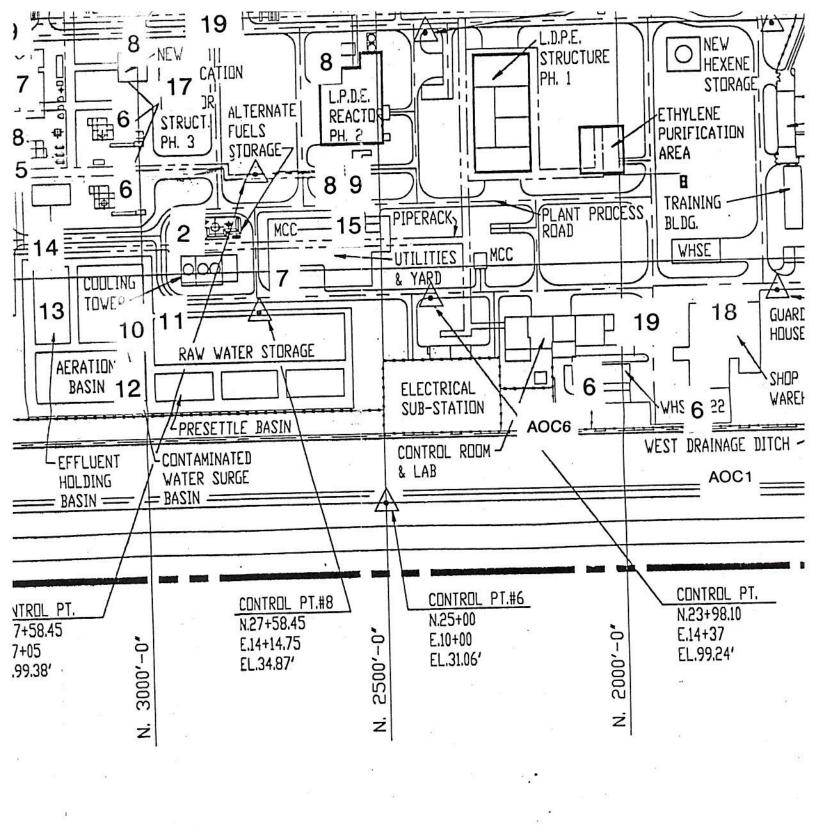
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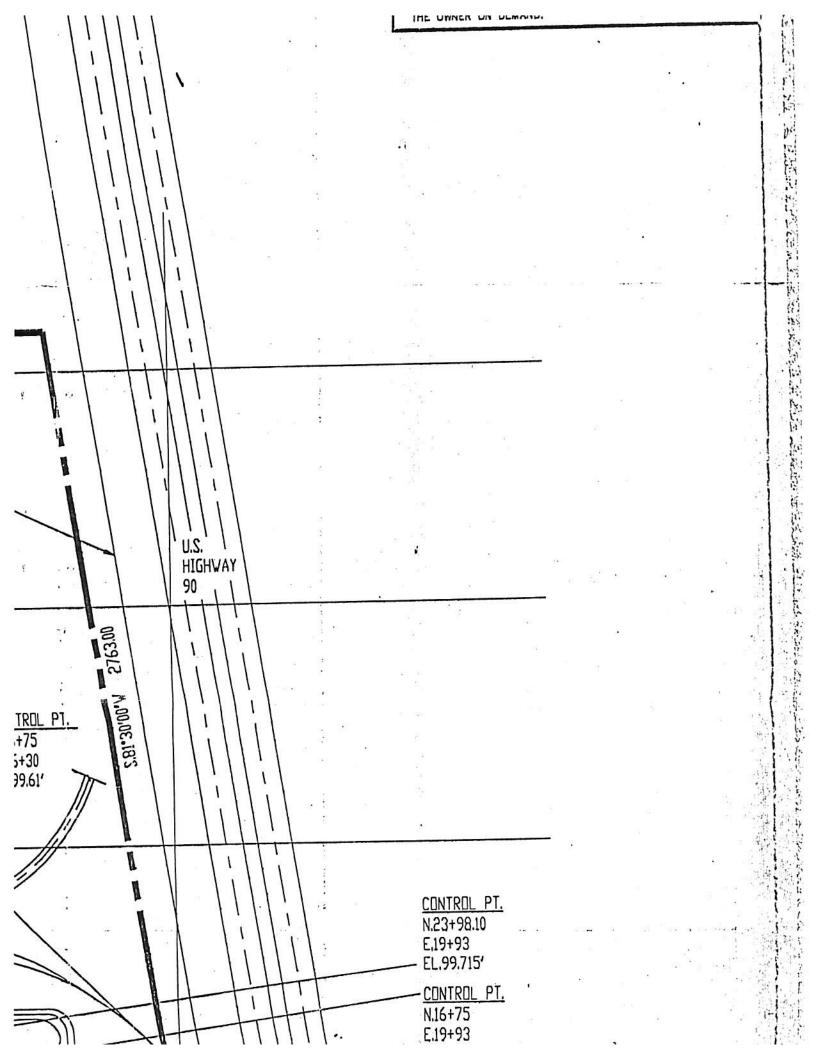
	REVISIONS	DATE
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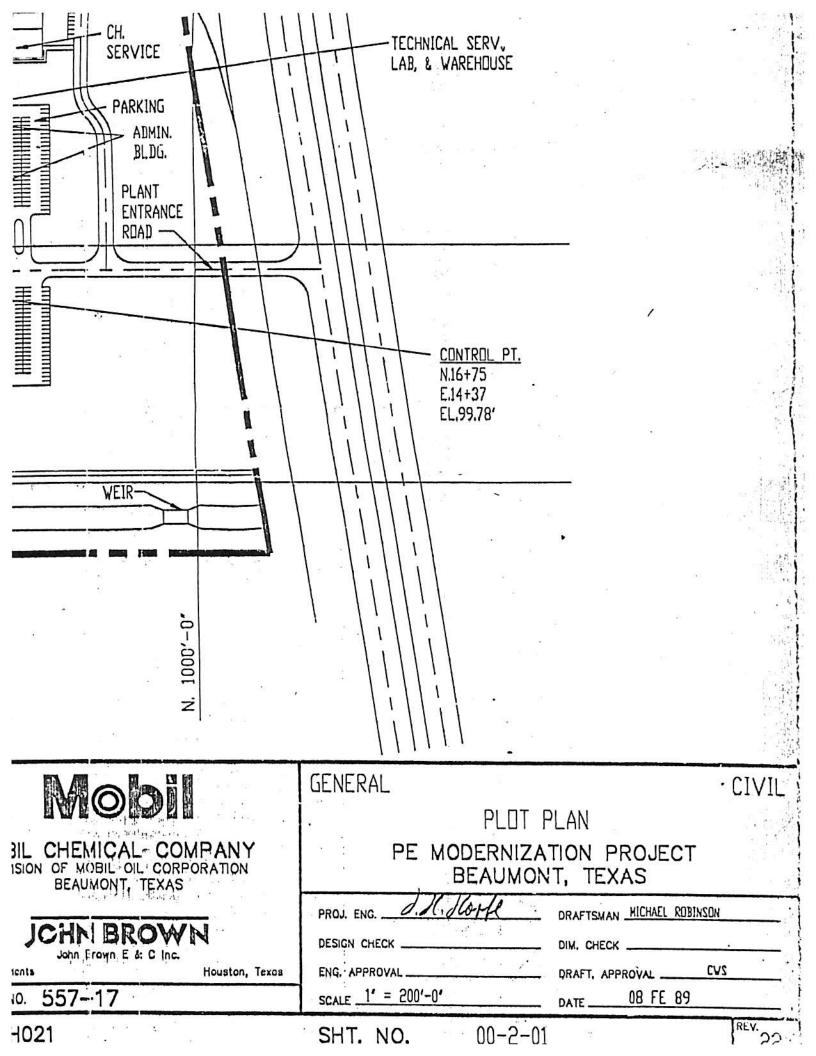
IN AND SWMU LOCATION PE PLANT





	REFERENCE DRAWINGS	DRAWING STATUS
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		REVISED & APPROVED FOR CONSTRUCTION REV. 9-1;





DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facili	ty Name:	ExxonMobil Chemical Plant
Facili	ty Address:	5000 Bayway Dr. Baytown, TX 77522
Facili	ty EPA ID #:	TXD980809909
TCE	Solid Waste Rep	gistration ID #:
1.	groundwater, si	ole relevant/significant information on known and reasonably suspected releases to soil, urface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Inits (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in nation?
	x	If yes - check here and continue with #2 below.
•0	*	If no - re-evaluate existing data, or
		if data are not available skip to #6 and enter IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Are groundwater, soil, surface water, sediments, or air media known or reasonably suspected to be "contaminated" above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

Groundwater	Yes _x	<u>No</u> ?	Rationale / Key Contaminants Benzene, Ethylbenzene, Toluene, Xylenes, MTBE
Air (indoors) ² Surface Soil (e.g., < Surface Water	2 ft)x_	<u>x</u> =	Benzene, Ethylbenzene, Toluene, Xylenes, MTBE
Sediment Subsurf. Soil (e.g., > Air (outdoors)	· ·	_x	Benzene, Ethylbenzene, Toluene, Xylenes, MTBE
apı	propriate "leve		#6, and enter "YE," status code after providing or citing encing sufficient supporting documentation demonstrating eded.
"co	ontaminated" i	medium, citing nat the mediu	continue after identifying key contaminants in each g appropriate "levels" (or provide an explanation for the m could pose an unacceptable risk), and referencing
If t	ınknown (for a	any media) - sl	cip to #6 and enter "TN" status code.
for Class 2 groundwater ing	esidential and estion. Ther	d commercial re is non-aque	Toluene, Xylenes, MTBE /industrial protective concentration levels (PCLs) cous phase liquid and the plume has migrated off- g corrective action program (consisting of pump and
treat, etc.). Residential PCL affected drinking water well that the appropriate PPE be	s will be achi ls or irrigatio e worn when	ieved in the or on wells within monitoring w	ff-site affected property. There are no off-site n a one- mile radius of the site. The facility requires rells are sampled to reduce exposure. For further
21, 2013 and January 29, 20 Corrective Action Program	014; and Step Report for th	o 3: Facility O ne ExxonMobi	prective Action Monitoring Reports, dated January perations Area (FOA) Report — Monitoring and il Baytown Chemical Plant dated July 8, 2013; and mment Letter, dated April 16, 2014.
Footnotes:			

¹ "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there complete pathways between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential Human Receptors (Under Current Conditions)

"Contaminated" Media Groundwater Air (indoors)	Residents _Y	Workers Y_	Day-Care _N	Construction _Y_	Trespassers _Y_	RecreationN_	Food ³ _N
Soil (surface, e.g., <2 ft)	_Y	<u>Y_</u>	_N	<u>_Y_</u>	<u>_Y_</u>	N_	_N_
Sediment				<u> </u>	-		
Soil (subsurface e.g., >2 ft) Air (outdoors)	Y_	Y_	_N	_ <u></u>	<u>_Y_</u>	N_	_N_
			-	-			

Instructions for Summary Exposure Pathway Evaluation Table:

- 1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.
- 2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- If no (pathways are not complete for any contaminated media-receptor combination) skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional <u>Pathway Evaluation Work Sheet</u> to analyze major pathways).
- _X_ If yes (pathways are complete for any "Contaminated" Media Human Receptor combination) continue after providing supporting explanation.
- If unknown (for any "Contaminated" Media Human Receptor combination) skip to #6 and enter "IN" status code.

Rationale and Reference(s):): Benzene, Ethylbenzene, Toluene, Xylenes, MTBE are detected above TRRP residential and commercial/industrial protective concentration levels (PCLs) for Class 2 groundwater ingestion. There is non-aqueous phase liquid and the plume has migrated off-site. However, the plume is contained by the on-going corrective action program (consisting of pump and treat, etc.). Residential PCLs will be achieved in the off-site affected property. There are no off-site affected drinking water wells or irrigation wells within a one-mile radius of the site. The facility requires that the appropriate PPE be worn when monitoring wells are sampled to reduce exposure. For further information see 2013 through 2014 Groundwater Corrective Action Monitoring Reports, dated January 21, 2013 and January 29, 2014, and Step 3: Facility Operations Area (FOA) Report — Monitoring and Corrective Action Program Report for the ExxonMobil Baytown Chemical Plant dated July 8, 2013; and Addendum Response to TCEQ December 20,2013 Comment Letter, dated April 16, 2014.

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

4	Can the exposures from any of the complete pathways identified in #3 be reasonably expected to be "significant" (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?
3	If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
	_x If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
	If unknown (for any complete pathway) - skip to #6 and enter "IN" status code.
Rationa	are detected above TRRP residential and commercial/industrial protective concentration levels (PCLs) for Class 2 groundwater ingestion. There is non-aqueous phase liquid and the plume has migrated off-site. However, the plume is contained by the on-going corrective action program (consisting of pump and treat, etc.). Residential PCLs will be achieved in the off-site affected property. There are no off-site affected drinking water wells or irrigation wells within a one-mile radius of the site. The facility requires that the appropriate PPE be worn when monitoring wells are sampled to reduce exposure. For further information see 2013 through 2014. Groundwater Corrective Action Monitoring Reports, dated January 21, 2013 and January 29, 2014, and Step 3: Facility Operations Area (FOA) Report — Monitoring and Corrective Action Program Report for the ExxonMobil Baytown Chemical Plant dated July 8, 2013; and Addendum Response to TCEQ December 20,2013 Comment Letter, dated April 16, 2014.

¹ If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

Can the "significant" exposures (identified in #4) be shown to be within acceptable limits?

•	
x_	If yes (all "significant" exposures have been shown to be within acceptable limits) continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
S	If no (there are current exposures that can be reasonably expected to be "unacceptable") continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure,
	If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s): Benzene, Ethylbenzene, Toluene, Xylenes, MTBE are detected above TRRP residential and commercial/industrial protective concentration levels (PCLs) for Class 2 groundwater ingestion. There is non-aqueous phase liquid and the plume has migrated off-site. However, the plume is contained by the on-going corrective action program (consisting of pump and treat, etc.). Residential PCLs will be achieved in the off-site affected property. There are no off-site affected drinking water wells or irrigation wells within a one- mile radius of the site. The facility requires that the appropriate PPE be worn when monitoring wells are sampled to reduce exposure. For further information see 2013 through 2014 Groundwater Corrective Action Monitoring Reports, dated January 21, 2013 and January 29, 2014, and Step 3: Facility Operations Area (FOA) Report — Monitoring and Corrective Action Program Report for the ExxonMobil Baytown Chemical Plant dated July 8, 2013; and Addendum Response to TCEQ December 20,2013 Comment Letter, dated April 16, 2014.

6.	(CA725), and ob	priate RCRIS status codes for the Current Human Exposures Under Control EI event code tain Supervisor (or appropriate Manager) signature and date on the EI determination below opriate supporting documentation as well as a map of the facility):
	X_	YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the ExxonMobil Chemical Plant facility, EPA ID #_TXD980809909, located at 5000 Bayway Dr, Baytown, TX 77522 under current and reasonably expected conditions. This determination will be reevaluated when the Agency/State becomes aware of significant changes at the facility.
		NO - "Current Human Exposures" are NOT "Under Control."
		IN - More information is needed to make a determination.
	Completed by Supervisor	(signature) Metall Date07/28/2014
	Locations where	References may be found:
	TCEQ C	Central Records, Austin, TX
	Contact telephon	e and e-mail numbers:

Final Note: The purpose of the Human Exposures EI is to qualitatively screen exposures based on current land and groundwater use. A "YE" determination does not constitute a screening tool that ends the corrective action process. The "YE" determination may be changed at any time as new information becomes available.

Project Manager listed above

maureen,hatfield@tceq.texas.gov

(512) 239-2200

TCEQ Interoffice Memorandum

To:

Central Records Files (MC - 199)

ExxonMobil Chemical Plant- Baytown

TCEQ SWR No. 33880

Thru: Merrie Smith, Supervisor

Team 1, VCP-CA Section, Remediation Division

From:

Mauxeen Hatfield, P.G., Project Manager

Col Team 1, VCP-CA Section, Remediation Division

Date:

August 14, 2015

Subject:

Documentation of achievement of GPRA facility-wide remedy selection

(CA-400)

EPA ID No. TXD980809909

CN No. CN602880288; RN No. RN102574803

Agreed Order No. 95-1078-IHW-E

Based on a file review, remedies have been selected for all units and areas of concern (AOCs) subject to RCRA/HSWA, and/or other corrective action activities conducted at the above-referenced facility. The RCRA milestone of facility-wide Remedy Decision (CA400)¹ has been achieved, based on the submittal of the Corrective Action Order application to complete response actions and establish a Facility Operation Area at the ExxonMobil Baytown Chemical Plant.

The units and AOCs considered in this evaluation are included in the list below:

Table 1: RCRA Corrective Action Program

RFI Units & AOCs subject to Corrective Action	Date for CA400-Remedy Decision ¹	Date for CA550-Approval of Remedy Construction/	
	* 10 mm	Completion2	
PWo3 Area LNAPL plume	February 25, 20153	N/A	
Tank Farm 3000 Area	February 25, 20153	N/A	
1,1-Dichloroethene Plume	February 25, 20153	N/A	
Well PW-03B Area Tank 4013 MTBE Plume	February 25, 20153	N/A	
Tank 3053 Area	February 25, 20153	N/A	

Table 2: RCRA Compliance or Corrective Action Monitoring Program

TCEQ Solid Waste Registration No. 33880 Interoffice Memorandum dated August 14, 2015 Page 2

RCRA Regulated, Permitted Units subject to Compliance or Corrective Action Monitoring	Date for CA400-Remedy Decision ¹	Date for CA550-Approval of Remedy Construction/ Completion ²
N/A		

Table 3: Other Programs

Interim Status, Unauthorized and Other Units/AOCs	Date for CA400-Remedy Decision ¹	Date for CA550-Approval of Remedy Construction/ Completion ²
N/A		

To date, no additional units subject to corrective action requirements have been identified at the facility.

J.F. For Maurien Hatfield

Maureen Hatfield Jzz Fouly

Mr. Jason Ybarra, Waste Program Manager, TCEQ Region 12 Office, Houston

Footnote References:

- "The event when the state or EPA formally selects a remedy designed to meet RCRA Corrective Action long-term goals of protection of human health and the environment. This event code also applies when no further corrective action is required because stabilization measure(s) have already been implemented or because the site characterization has demonstrated the attainment of the long-term RCRA Corrective Action goals." See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approved remedy for this event code to apply facility-wide.
- 2) "The event when the state or EPA acknowledges in writing that the RCRA facility has completed construction of a facility's remedy that was designed to achieve long-term protection of human health and the environment, and that the remedy is fully functional as designed, whether or not final cleanup levels or other requirements have been achieved. Remedy construction may also acknowledge the event where no remedy is constructed." See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approval of the remedy construction or approval of the decision that no physical construction is needed for this event code to apply facility-wide.
- 3) Date confirmed through TCEQ correspondence review.
- 4) Date obtained from RCRAInfo database.
- 5) Date obtained from facility correspondence.
- 6) Date obtained from TCEQ database.

TCEQ Interoffice Memorandum

To:

Central Records Files (MC - 199)

Detrex Corporation. Arlington TCEQ SWR No. 33533

Thru

Merrie Smith, Supervisor

Team 1, VCP-CA Section, Remediation Division

From:

Maureen Hatfield, P.G., Project Manager

Team 1, VCP-CA Section, Remediation Division

Date:

August 14, 2015

Subject:

Documentation of achievement of GPRA facility-wide remedy selection

(CA-400)

EPA ID No. TXD980626154

TCEQ Hazardous Waste Permit No. HW-50021 CN No. CN600283386; RN No. RN100572858

Based on a file review, remedies have been selected for all units and areas of concern (AOCs) subject to RCRA/HSWA, and/or other corrective action activities conducted at the above-referenced facility. The RCRA milestone of facility-wide Remedy Decision (CA400)¹ has been achieved, based on the submittal of the Class 3 Permit Modification Application, and preparation of the Initial Draft Permit dated May 15, 2015.

The units and AOCs considered in this evaluation are included in the list below:

Table 1: RCRA Corrective Action Program

RFI Units & AOCs subject to	Date for CA400-Remedy	Date for CA550-Approval of
Corrective Action	Decision ¹	Remedy Construction/
	4	Completion2
1. AOC1-SWMUs 1 - <90 Day Generator Tank for Still Bottoms NOR 009	May 15, 20153	N/A
2. AOC 1-SWMU 2 - Solvent Recovery Still	May 15, 20153	N/A
3. AOC1 -SWMU 3 - Process Recovery area	May 15, 20153	N/A
4. AOC 2	May 15, 20153	N/A
5.SWMU 5 Trash Receptacle NOR 008	March 29, 20073	N/A

TCEQ Solid Waste Registration No. 33533 Interoffice Memorandum dated August 14, 2015 Page 2

RFI Units & AOCs subject to Corrective Action	Date for CA400-Remedy Decision1	Date for CA550-Approval of Remedy Construction/ Completion ²
6. SWMU 6 Tank and product line decommissioning NOR 014	March 29, 20073	N/A

Table 2: RCRA Compliance or Corrective Action Monitoring Program

RCRA Regulated, Permitted	Date for CA400-Remedy	Date for CA550-Approval of
Units subject to Compliance or Corrective Action Monitoring	Decision ¹	Remedy Construction/ Completion2
1. former RCRA-Unit Container Storage Area E and Dock Area NOR 013 also Part of AOC2	May 15, 20153	N/A

Table 3: Other Programs

Interim Status, Unauthorized and Other Units/AOCs	Date for CA400-Remedy Decision ¹	Date for CA550-Approval of Remedy Construction/ Completion ²
N/A		

To date, no additional units subject to corrective action requirements have been identified at the facility.

J.F. for Maureen Hatfield Maureen Hatfield Gran Forly

cc:

Sam Barrett, Waste Program Manager, TCEQ Region 4 Office, Dallas/Fort Worth

Footnote References:

- 1) "The event when the state or EPA formally selects a remedy designed to meet RCRA Corrective Action long-term goals of protection of human health and the environment. This event code also applies when no further corrective action is required because stabilization measure(s) have already been implemented or because the site characterization has demonstrated the attainment of the long-term RCRA Corrective Action goals." See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approved remedy for this event code to apply facility-wide.
- 2) "The event when the state or EPA acknowledges in writing that the RCRA facility has completed construction of a facility's remedy that was designed to achieve long-term protection of human health and the environment, and that the remedy is fully functional as designed, whether or not final cleanup levels or other requirements have been achieved.

TCEQ Solid Waste Registration No. 33533 Interoffice Memorandum dated August 14, 2015 Page 3

Remedy construction may also acknowledge the event where no remedy is constructed." See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approval of the remedy construction or approval of the decision that no physical construction is needed for this event code to apply facility-wide.

- 3) Date confirmed through TCEQ correspondence review.
- 4) Date obtained from RCRAInfo database.
- 5) Date obtained from facility correspondence.
- 6) Date obtained from TCEQ database.